

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OKLAHOMA**

IN RE:

COPPER TREE, INC.,
EIN # xx-xxx6608

CASE NO. 25-10088-T Chapter 7

Substantively Consolidated With

GREEN COPPER HOLDINGS, LLC,
EIN # xx-xxx9708;

Case No.: 24-10021-M Chapter: 7

Debtors.

**CRAIG A. BRAND, COUNSEL FOR PICTORIA STUDIOS USA, INC., RESPONSE TO ECF
189, ORDER TO SHOW CAUSE**

Craig A. Brand, Esq., Counsel for PICTORIA STUDIOS USA, INC., herewith responds to ECF 189, the Court's Order to Show Cause directed to ECF 179, 180 and 181, the Pro Se filings of PICTORIA STUDIOS USA, INC., as follows:

1. On July 21, 2025, the Clerk of Court docketed ECF 179, 180, and 181, executed pro se by the President of PICTORIA STUDIOS USA, INC. ("Pictoria"). Included in ECF 179 and 181 were the individual pro se filings executed by Michael Moran on behalf of Michael Moran and Erinne Moran, JTWROS as well as for Pictoria Studios USA, Inc. As required by the Rules and ECF procedures, ECF 179, 180 and 181 were not allowed to be filed by the filing parties utilizing the ECF system. As such, as required by the Rules, ECF 179, 180 and 181 had been mailed postage prepaid to the Clerk of this Court on July 18, 2025, but were only filed/docketed by the Clerk of Court on July 21, 2025. Admittedly, Claimant, PICTORIA STUDIOS USA, INC., was not properly executed using the signature of its President, even if it had been timely filed.

2. On July 21, 2025, the Court granted the undersigned counsel's request for Pro Hac Vice admission as Counsel for PICTORIA STUDIOS USA, INC., and MICHAEL MORAN AND ERINNE MORAN, JTWROS; however, after the pro se parties had already signed, mailed and the Clerk of Court entered their pleadings.

3. On July 23, 2025, ECF 193 and 194, respectively, the undesigned counsel filed his Notice of Appearance for Michael J. Moran and Erinne Moran, JTWROS and for Pictoria.

4. On July 24, 23025, this Court issued its Order to Show Cause directed to Pictoria and the undersigned counsel in ECF 189.

5. On July 24, 2025, ECF 197, the Clerk of Court issued a Memorandum of Deficiency directed, in part, to ECF 193 and 194.

6. On July 24, 2025, the undesigned Counsel filed ECF 203, his Notice of Appearance for Michel J. Moran and Erinne Moran, JTWROS, in compliance with ECF 197.

7. On July 24, 2025, the undesigned Counsel filed ECF 208, his Notice of Appearance for PICTORIA STUDIOS USA, INC., in compliance with ECF 197.

8. On July 24, 2025, the undersigned Counsel filed ECF 208 and ECF 208-1, the Amended Objections and Exhibits to Amended Objections of Claimant PICTORIA STUDIOS USA, INC., to ECF 156.

9. On July 24, 2025, the undersigned Counsel filed ECF 211 and 211-1 in Response to the Trustee's filing in ECF 135.

10. On July 25, 2025, the undersigned Counsel filed ECF 212, a Federal Rule of Civil Procedure 7.1 Disclosure for PICTORIA STUDIOS USA, INC.

11. As a result of the foregoing filings, the undersigned Counsel has fully complied with its obligations as required by ECF 189.

Respectfully Submitted by:

/s/ Craig Alan Brand, Esq.

Craig Alan Brand, Esq.
Florida Bar No. (FBN): 896111
6462 S. Jamaica Circle
Englewood, CO 80111
Tel. (303) 878-1477
Craig@thebrandlawfirm.com

Attorney for: Dale Takio, Taktik Enterprises, Inc.,
Pictoria Studios USA, Inc.,
Michael J. Moran and Erinne Moran, JTWROS,
Mike Moran a/k/a Michael J. Moran,
Dale Takio, Taktik Enterprises, Inc.,
Craig A. Brand and Adriana Soto, JTWROS,
Craig Brand,
Mystic Enterprises

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 25, 2025, a true and correct copy of the foregoing Amended FED. R. CIV. P. 7.1 Disclosure Statement was served electronically on participants in the CM/ECF system according to local procedures.

/s/ Craig Alan Brand, Esq.

Craig Alan Brand, Esq.
Florida Bar No. (FBN): 896111

Attorney for Dale Takio, Taktik Enterprises, Inc.,
Pictoria Studios USA, Inc.,
Michael J. Moran and Erinne Moran, JTWROS,
Mike Moran a/k/a Michael J. Moran,
Dale Takio, Taktik Enterprises, Inc.,
Craig A. Brand and Adriana Soto, JTWROS,
Craig Brand,
Mystic Enterprises